



THE COMMONWEALTH OF MASSACHUSETTS

**DEPARTMENT OF  
TELECOMMUNICATIONS & ENERGY**

**MITT ROMNEY**  
GOVERNOR

**KERRY HEALEY**  
LIEUTENANT GOVERNOR

ONE SOUTH STATION  
BOSTON, MA 02110  
(617) 305-3500

**JUDITH F. JUDSON**  
CHAIRMAN

**JAMES CONNELLY**  
COMMISSIONER

**W. ROBERT KEATING**  
COMMISSIONER

**BRIAN PAUL GOLDEN**  
COMMISSIONER

June 20, 2006

VIA EMAIL AND USPS

Barbara Anne Sousa  
Assistant General Counsel  
Verizon Massachusetts  
185 Franklin Street, 13<sup>th</sup> Floor  
Boston MA 02110

RE: Petition of the Board of Selectmen of the Town of Middlefield pursuant to  
G.L. c. 159, § 24, regarding the quality of Verizon's telephone service,  
D.T.E. 06-6

Dear Attorney Sousa:

Enclosed please find the third set of information requests issued by the Department of Telecommunications and Energy ("Department") to Verizon Massachusetts ("Verizon") in the above-captioned matter. Please submit Verizon's responses to the Department and the parties on or before 5:00 p.m, Wednesday, July 5, 2006. If you have any questions regarding the information requests, please contact me at 617-305-3561.

Sincerely,

/s/  
Carol M. Pieper  
Hearing Officer

Encs.

cc: D.T.E. 06-6 service list (w/encs.)

**COMMONWEALTH OF MASSACHUSETTS  
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

**THIRD SET OF INFORMATION REQUESTS OF THE  
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY  
TO VERIZON MASSACHUSETTS, D.T.E. 06-6**

---

Pursuant to 220 C.M.R. § 1.06(6)(c), the Department of Telecommunications and Energy (“Department”) submits to Verizon Massachusetts (“Verizon”) the following Information Requests.

**Requests**

- DTE-3-1      In response to DTE-2-3, Verizon provided monthly trouble reports for the Town of Middlefield (“Town” or “Middlefield”) for the months of March 2006 and April 2006. Please provide monthly reports for the Town for June 2006 when such information becomes available.
- DTE-3-2      Please explain the discrepancy between the number of double poles viewed in the Town photographs provided by the Board of Selectmen on June 9, 2006 (“Town Photographs”), and the Double Pole Report provided by Verizon in response to DTE-1-13.
- DTE-3-3      Please state whether the double poles in Middlefield, as shown in the Town Photographs 005, 006, 007, 008, 009, 010, 011, 012, 042, 043, 044, 045, 046, 047, 048, 063, 064, 065, 066, 071, 072, 073, 078, 079, 080, 092, 093, 094, 095, 096, 097, 101, 102, 103, 112, 114, 115, 116, 117, 119, 120, 121, 123, 124, 125, 126, 127, 128, 129, 130, 143, 144, and 145, have any impact on service quality or constitute a safety concern.
- DTE-3-4      Please state whether the open interfaces or other equipment in Middlefield, as shown in Town Photographs 018, 035, 036, 040, and 041, have any impact on service quality or constitute a safety concern.
- DTE-3-5      Please state whether the equipment hanging by a wire shown in Town Photographs 037, 038, and 039 has any impact on service quality or constitutes a safety concern.
- DTE-3-6      Please state whether the unraveling, unconnected, and/or crossed wires as shown in Town Photographs 057, 058, 084, 085, 086, 087, 088, 089, 098, 099, 118, 119, 120, and 122 have any impact on service quality or constitute a safety concern.
- DTE-3-7      Please state whether the wires that are not attached to nearby poles or support, as shown in the Town Photographs 013, 014, 059, 060, 061, 062, 075, 076, 077, 083, 146, 147, 148, 149, 150, 151, and 159, have any impact on service quality or constitute a safety concern.
- DTE-3-8      Please state whether the pole as shown in Town Photographs 069 and 070 has Verizon and/or WMECO attachments. Also, state whether there is a secondary pole to which any attachments could be moved. Please state whether the pole shown in Town Photographs 069 and 070 constitutes a safety concern.

- DTE-3-9 Please state whether the tree density in proximity to poles and/or wires, as shown in Town Photographs 015, 016, 017, 019, 020, 021, 022, 023, 024, 025, 026, 027, 031, 032, 033, 034, 055, 056, 104, 105, 106, 107, 108, 110, 111, 113, 131, 132, 133, 134, 137, 138, 139, 140, 141, 142, 152, 160, 161, 162, 163, and 167, has any impact on service quality or constitutes a safety concern.
- DTE-3-10 Please state whether the low hanging wires, as shown in Town Photographs 049, 050, 051, 052, 053, 054, 153, 157, and 158, have any impact on service quality or constitute a safety concern.
- DTE-3-11 Please provide the minimum clearance height requirements for wires in the communications space as well as the minimum ground clearance height requirements for such wires as they traverse from pole to pole.
- DTE-3-12 If Verizon identifies any item in response to Information Requests DTE-3-3, DTE-3-4, DTE-3-5, DTE-3-6, DTE-3-7, DTE-3-8, DTE-3-9, or DTE-3-10 that affects service quality or constitutes a safety concern, please describe Verizon's plans to address the situation(s) and provide a proposed timeframe for resolution of the problem.
- DTE-3-13 In response to DTE-2-6, Verizon provided customer records indicating that the technician determined the pole was unsafe to climb (see DTE-2-6, Att. 20, at 22). Please state whether this is a double pole situation where Verizon's equipment is scheduled to be moved to a new pole.
- DTE-3-14 Please state when a pole survey was last conducted in Middlefield by either Verizon or WMECO.

DATED: June 20, 2006